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CAUSE NO. 96-05323
AZAM ANWAR, M.D. Individually) IN THE DISTRICT COURT OF
and on behalf of ENDOVASCULAR)
SUPPORT SYSTEMS, INC., and)
BENITO HIDALGO, individually)
and on behalf of ENDOVASCULAR)
SUPPORT SYSTEMS, INC., a)
California Corporation)
Plaintiffs,)
VS.) DALLAS COUNTY, TEXAS
ARTERIAL VASCULAR ENGINEERING,)
INC., a Delaware Corporation,)
SIMON H. STERTZER, M.D.,)
GERALD DORROS, M.D., JOHN)
MILLER and BRADLY JENDERSEE,)
Defendants.) 298TH JUDICIAL DISTRICT
VIDEOTAPED ORAL DEPOSITION

AZAM ANWAR, M.D.

CERTIFIED COPY

ANSWERS AND VIDEOTAPED ORAL DEPOSITION OF AZAM
ANWAR, M.D., a witness produced at the instance of the
Defendant, taken in the above-styled and numbered cause on
the 9th day of January, 1997, at 10:00 o'clock a.m., before
KRISTI KLUND, a Certified Shorthand Reporter in and for the
State of Texas, at the offices of Thompson & Knight, located
at 1700 Pacific Avenue, Suite 3300, in the City of Dallas,
County of Dallas, State of Texas, in accordance with the
Notice hereto attached and the Texas Rules of Civil
Procedure and the stipulations hereinafter set forth.

1 A That's correct, yes.

2 Q When did you first meet Dr. Simon Stertzger?

3 A I met him in July of 1989 in San Francisco.

4 Q And that was because you were doing your
5 fellowship work --

6 A That's correct.

7 Q -- at Seton? What was his position at Seton
8 at the time?

9 A I'm not sure of his exact title, but he was
10 one of the two major interventional cardiologists at Seton.

11 Q You also said you worked for Mr. Myler -- or
12 Dr. Myler?

13 A Yeah. Dr. Myler and Dr. Stertzger were the
14 head of the -- the program.

15 Q Who did you work for more closely? Who did
16 you work for most closely?

17 A Probably Dr. Stertzger.

18 Q But you worked with both?

19 A Yes.

20 Q What type of work did you perform at Seton?

21 A Could -- could you be a little more specific,
22 or you want me to just give you a general --

23 Q Very general.

24 A As -- when you're doing your fellowship there,
25 you -- your duties are to evaluate the patients and assist

1 with the procedures. And I would say at that time
2 Dr. Stertzter was doing more procedures than Dr. Myler. So
3 from a technical standpoint I had more interaction with him.

4 Q What type of procedures did you assist
5 Dr. Stertzter --

6 A We --

7 Q -- on?

8 A We performed procedure called coronary
9 angioplasty. It's just opening up heart arteries and there
10 are multiple techniques used in doing that.

11 Q What was your role?

12 A My role was to -- was to assist and over time
13 our role was to perform the procedure under supervision.

14 Q When did you first meet Mr. Hidalgo?

15 A I met him at the same time, that would be July
16 of 1989.

17 Q Was he working at Seton too?

18 A Yes.

19 Q Is that how you met him?

20 A Yes.

21 Q Did he -- was he assisting Dr. Stertzter in the
22 procedures he was performing?

23 A Yes.

24 Q Did you become friends with Mr. Hidalgo?

25 A Yes.

1 was at that time.

2 Q Did you know who invented it?

3 A I had an idea.

4 Q Was the idea Mr. Boneau?

5 A The -- well, he was one of them, yeah.

6 Q Okay. Who else did you believe when you were
7 in California had invented the Boneau Stent?

8 A Ben Hidalgo.

9 Q What about Dr. Stertzer?

10 A I'm -- I'm not sure of his exact involvement
11 in the development of the stent.

12 Q You weren't sure at the time? Are you saying
13 you're not sure now or that you weren't sure when you lived
14 in California?

15 A I wasn't sure at the time when -- when I lived
16 in California.

17 Q Do you know now?

18 A I -- I know of his type of involvement, and
19 maybe you could explain what you mean by development.

20 Q Well, you used that term. What do you mean
21 when you used the term development?

22 A Development is to develop the concept and to
23 create a design and manufacturer.

24 Q Do you believe today that Dr. Stertzer was
25 involved in the development of the stent, as you've defined

1 that term?

2 A He had a partial role.

3 Q What role?

4 A He -- his role was more on the clinical
5 implementation.

6 Q Meaning?

7 A Meaning, getting the -- creating the
8 atmosphere, providing finances, and then delivering the
9 stent into patients.

10 Q Do you know what type of feedback he gave
11 Mr. Boneau in the design of the stent?

12 A I would be speculating.

13 Q Do you know firsthand what type of
14 contribution, if any, Mr. Hidalgo made to the stent?

15 A I don't have firsthand information.

16 Q What did you -- what have you heard that has
17 been the extent of his involvement?

18 A At what time?

19 Q Now. As of now.

20 MR. RASCH: Well, I assume you're not
21 asking --

22 BY MR. HAGE:

23 Q Okay. Prior -- not during this lawsuit.
24 Prior to your filing suit, what -- what have you heard was
25 the extent of Mr. Hidalgo's involvement in the design of the

1 stent?

2 A My understanding was that he had extensive
3 involvement in designing this.

4 Q What involvement, in particular?

5 A Coming up with the configuration.

6 Q From whom did you obtain that information?

7 A I would be guessing of -- of who exactly told
8 me that.

9 Q Whatever work he performed would have been
10 prior to your having participated in the stent implantation,
11 correct?

12 A That's probably correct.

13 Q While you were in California did you ever
14 discuss with anyone your investing in ESS?

15 A No.

16 Q While in California, did you ever express any
17 interest in doing clinicals on the Boneau Stent?

18 A Yes.

19 Q What did you do in that regard?

20 A I had discussions with Dr. Stertzer and
21 Mr. Boneau and Mr. Hidalgo.

22 Q What was the nature of those discussions?

23 A The discussions were general. I -- I had an
24 interest in -- in further developing the stent. I thought
25 it had a very promising future from a clinical standpoint.

1 NO. 96-C5323-M
2 AZAM ANWAR, M.D., Individually) IN THE DISTRICT COURT
3 and on Behalf of ENDOVASCULAR)
4 SUPPORT SYSTEMS, INC., and)
5 BENITO HIDALGO, Individually)
6 and on Behalf of ENDOVASCULAR)
7 SUPPORT SYSTEMS, INC., a)
8 California Corporation.)
9 VS.) DALLAS COUNTY, TEXAS
10)
11 ARTERIAL VASCULAR ENGINEERING,)
12 INC., a Delaware Corporation,)
13 SIMON H. STERTZER, M.D., GERALD)
14 DORROS, M.D., JOHN MILLER and)
15 BRADLY JENDERSEE) 298TH JUDICIAL DISTRICT
16
17 &
18
19 SUPERIOR COURT OF THE STATE OF CALIFORNIA
20
21 COUNTY OF SAN MATEO
22
23 BENITO HIDALGO; DR. AZAM ANWAR,) CASE NO. 397221
24 Individually and on behalf of)
25 ENDOVASCULAR SUPPORT SYSTEMS,)
INC.,)
Plaintiffs,)
VS.)
ARTERIAL VASCULAR ENGINEERING,)
INC., a Delaware Corporation;)
SIMON H. STERTZER, M.D.; GERALD)
DORROS, M.D.; JOHN D. MILLER;)
BRADLY A. JENDERSEE, and DOES)
ONE throught TEN, inclusive.)
Defendants.)

VIDEOTAPED ORAL DEPOSITION OF AZAM ANWAR, M.D.

TAKEN ON MARCH 10, 1997

VOLUME I OF V

1 Approximate. I mean more or less than ten, more or less
2 than 20? Can you give me some kind of range or order of
3 magnitude?

4 A I would say less than ten patients, more than
5 three, you know, three to ten patients.

6 Q Do you know what the results and conclusions
7 were of the portion of the clinical trials that you worked
8 on in San Antonio?

9 A No. I don't know the -- the overall result
10 because there are multiple other centers involved, and we
11 were, you know, one of the involved centers.

12 Q What about at your own center? Did you get a
13 sense for how the study was going; what the success rate
14 was; what conclusions were being drawn?

15 A Yeah. I had some -- some general concepts
16 about that stent and stenting, in general.

17 Q All right. Could you tell me, please, what
18 general concepts or conclusions you drew from your knowledge
19 of the San Antonio portion of the Palmaz Stent study?

20 A First, stents are a useful device in making
21 the artery look very good and achieving a -- a good lumen.
22 We also learned that, you know, it's not always easy to
23 deliver the stent to the location that we -- that we want
24 to. I also realized at that time that putting in several
25 stents was probably not a great idea, meaning more than --

1 putting more than three or four stents in an artery led to
2 problems down the road.

3 Q Why?

4 A It's -- it created a nidus or thrombus or clot
5 formation, and those patients' arteries closed off.

6 MR. MONACH: I'm sorry. Could you read
7 that answer back, please?

8 (Reporter read requested portion.)

9 BY MR. MONACH:

10 Q What do you mean by an "itis" or clot
11 formation?

12 THE WITNESS: I said nidus, n-i-d-u-s.

13 THE REPORTER: I'm sorry.

14 BY MR. MONACH:

15 Q What does that mean?

16 A If you have several pieces of foreign material
17 in a small artery, blood can stagnate and -- and once blood
18 stagnates it can clot.

19 Q Was there just one length of stent that you
20 used in the San Antonio study?

21 A I don't recall the specific length of that
22 stent.

23 Q Do you recall that in the San Antonio clinical
24 study you had a single length, and then -- then you would
25 use multiple stents if -- if you needed a greater length, as

1 opposed to having different lengths of stent available?

2 A My general understanding is that it was -- it
3 was -- it was one length and that you would -- we would use
4 multiple of those stents and -- if a longer length was
5 necessary.

6 Q And you had at least some sense that if you
7 used multiple lengths, you increased the chances of a blood
8 clot; is that correct?

9 A What I said is if you used multiple stents,
10 that those patients were at risk for having the artery close
11 off.

12 Q Okay. Whether it was because of a clot or for
13 some other reason; is that correct?

14 A That's -- that's true, yeah.

15 Q Okay. And is that -- well, did you ever
16 determine why that was? Is it that if you had space between
17 the stents there's a -- there's a place for the plaque to
18 come back through in between the stents?

19 A The reason why patients with multiple stents
20 close off are -- are -- are variable and multiple, and it's
21 an understanding that I've gained over the last decade of my
22 experience. So I can't recall exactly what I was thinking
23 at that moment ten years ago.

24 Q Okay. All right. Is one of the reasons that
25 you believe today the risk of closure is greater with

1 multiple stents because if you have multiple stents that
2 aren't connected, they can move and move apart from one
3 another?

4 A No. I -- I didn't -- I don't think that's --
5 that's one of the causes.

6 Q Okay. What -- what do you believe today are
7 reasons that multiple stenting can result in a greater
8 percentage of vessel -- vessel closure than single stents?

9 A The major reason is that the artery that
10 requires multiple stents is a sicker artery, has more
11 diffuse disease, and that's probably the -- the major
12 reason. There are other technical reasons that we have
13 found over the years to be important as well.

14 Q What are those?

15 A Using high pressure balloons, you know,
16 putting the stent in and then inflating with high pressures
17 to really imbed the stent in the artery. We found that to
18 be important.

19 Q That yields a better result?

20 A That yields a better -- better initial result,
21 yes.

22 Q Anything else?

23 A Also, we're -- we're smarter about our patient
24 selection and also our anticoagulation regimen.

25 Q By "anticoagulation regimen," what do you

1 Q Okay. Are you a -- a member of the Crescent
2 Club?

3 A No, I'm not.

4 Q Okay. You don't have to be a member to take
5 people to dinner there?

6 A One of my colleagues was a member, and we --
7 we had him make the reservations.

8 Q All right. We'd request that you -- if you
9 haven't done so already, to check and see if you have any
10 receipt or any record that would indicate when this dinner
11 was with --

12 A Sure.

13 Q Will you do that? Thank you. Okay. What's
14 the name of your colleague who was a member of the Crescent
15 Club who made this arrangement?

16 A I believe it was Dr. Menter, M-e-n-t-e-r.

17 Q Okay. During the time that you were at Seton,
18 and I mean to include Indianapolis -- the Indianapolis
19 period from July '89 to -- through July of '90, how many
20 times did you meet Mike Boneau in person?

21 A I can't tell you the specific number of
22 meetings.

23 Q Well, was it more or less than five?

24 A It was more than five.

25 Q Can you give me a -- a better estimate? You

1 know, was it more than -- was it more than 10? Was it more
2 than 15?

3 A I'd say somewhere more than five and less than
4 15.

5 Q Okay. Do you remember any of those meetings,
6 what occurred at any of those meetings?

7 A I don't recall the specifics of what occurred
8 in those meetings. Most of the meetings were in the cardio
9 cath lab.

10 Q Did all of your interactions with Mike Boneau
11 in San Francisco relate to performing procedures in which a
12 Boneau Stent was being used?

13 A No.

14 Q All right. Were there some times when you met
15 with Mike Boneau that he was there because you were involved
16 in a procedure, implanting a Boneau Stent?

17 A I don't have absolute knowledge of whether he
18 was there every time we were implanting a Boneau Stent.

19 Q Okay. Was he there --

20 A He often -- he often would be there when that
21 was going on.

22 Q Okay. Just to see how it went, that sort of
23 thing?

24 A Yeah.

25 Q All right. How were you introduced to Mike

1 Boneau?

2 A I don't have a specific recollection of how I
3 was introduced to him.

4 Q Well, what did -- what did you know about Mike
5 Boneau, or what did you understand about his role, showing
6 up at the heart institute or Seton hospital?

7 A Well, the stent had his name on it.

8 Q Uh-huh.

9 A And he would have a stent that he had
10 produced, and it would be in his pocket. You know, he would
11 bring stents into the -- into the lab.

12 Q Did you ever talk to Mr. Boneau about what he
13 had done in the invention or the development of the Boneau
14 Stent that bore his name?

15 A During what time period or --

16 Q Ever.

17 A Oh, yeah.

18 Q Okay. When did you do that?

19 A You can -- you know, there's a period of five
20 or six years that -- that I had talked to Mike.

21 Q Well, let's start with the 1989 to 1990
22 period. Tell me everything you can recall about the nature
23 of the meetings that you had with Mike Boneau.

24 A Some of these I've told you. He would come
25 into the lab, you know, before, during and after

1 procedures. There would be other times where he would be
2 there where a Boneau Stent was not involved, but he came
3 there to -- came by the lab to -- to talk to, I imagine,
4 Simon or -- or Ben and I'd run into him and -- and have
5 cordial, you know, hi, hello, interactions.

6 After I left San Francisco and -- well,
7 towards the end my involvement had grown with his stent and,
8 you know, he called me in Dallas, for instance, when he
9 wanted to sell his -- sell a portion of his stent; he called
10 me. So we interacted in -- in that aspect and I got more
11 historical information from him and I've -- you know, I'd
12 spoke to him on other occasions.

13 Q Okay. Approximately how many times have you
14 spoken to Michael Boneau since you purchased the ESS stock
15 from him?

16 A I'm guessing, but there are, you know,
17 multiple phone conversations.

18 Q Multiple just means more than one. Can you be
19 a little more precise or give me a range? How many times
20 have you talked to Mike Boneau since you bought the ESS
21 stock?

22 A Sure. More than -- more than ten times.

23 Q Since 1991, you've spoken to Mike Boneau more
24 than ten times and fewer than how many times?

25 A Fewer than 30.

1 Q All right. At any time, have you talked to
2 Mike Boneau about the invention of the Boneau Stent?

3 A I don't recall specific conversation about
4 that.

5 Q Have you ever talked with Mike Boneau about
6 whether he's the sole inventor of the stent?

7 A No, I have not.

8 Q Have you ever talked to Mike Boneau about what
9 role, if any, Ben Hidalgo had in the invention or the
10 development of the Boneau Stent?

11 A I don't recall.

12 Q Did you have any face-to-face discussions with
13 Mike Boneau about the sale of the ESS stock from him to you?

14 A I don't believe so.

15 Q Okay. Have you had any face-to-face
16 discussions with Mike Boneau since you bought the ESS stock
17 from him?

18 A I don't recall.

19 Q You bought the ESS stock from Mike Boneau in
20 October of 1991; is that correct?

21 A Yes.

22 Q All right. And from 1990 -- from October 1991
23 to today you don't recall ever having an in-person meeting
24 with Mike Boneau; is that correct?

25 A I don't believe so. I just don't have any

1 recollection of any meetings with him.

2 Q All right. When was the last time you spoke
3 to him?

4 A Sometime in 1996.

5 Q Before or after you filed the lawsuit against
6 AVE?

7 A Definitely before -- I think before and
8 after.

9 Q No conversations with Mike Boneau in 1997; is
10 that correct?

11 A I don't believe so, no.

12 Q Have you had any written communication or
13 correspondence with Mike Boneau since you exchanged the Bill
14 of Sale for the ESS stock?

15 A I don't recall any correspondence.

16 Q Are you aware of any modifications that were
17 made to the Boneau Stent from July of 1990 to -- I'm sorry,
18 July of '89 to July of '90?

19 A No.

20 Q Are you aware of any modifications or redesign
21 of the Boneau Stent that were made from July of 1990 through
22 July of 1992?

23 A I don't recall any -- I don't recall the
24 specific modifications.

25 Q Do you know whether there were any?

1 A I don't have any recollection or knowledge,
2 no.

3 Q Okay. Is it fair to say that no modifications
4 or refinements or redesigns of the Boneau Stent were made as
5 a result of suggestions that you provided?

6 A I don't have any knowledge of that either
7 way. I can't answer that either way. You'd have to ask
8 him.

9 Q Well, do you recall ever -- you've testified
10 already about a lack of knowledge of whether changes were
11 made. Do you have any recollection of proposing any changes
12 or refinements to the Boneau Stent?

13 A That's a very broad question. If you could --

14 Q Well, I mean it to be broad.

15 A Okay. The concept of using the -- the stent
16 as a building block, quote/unquote "Tonka Toys," that was
17 something that I -- that I brought up.

18 Q What do you mean by using the stent as a
19 building block or, to use your term, Tonka Toys?

20 A You can take the basic -- either for 7
21 millimeter unit and use those either in combination or use
22 many of those same units and fuse them together so that you
23 can build longer stents or stents of varying lengths.

24 Q Uh-huh. Did you ever discuss that concept
25 with anyone?

1 A Yeah. I discussed that with Stertz.

2 Q When did you do that?

3 A I imagine -- it's certainly possible that
4 those discussions occurred when I was a fellow or soon
5 thereafter.

6 Q Well, do you have a recollection of discussing
7 that with Dr. Stertz when you were a fellow or soon
8 thereafter?

9 A As a matter of fact, I do remember talking to
10 him about it when I was a fellow.

11 Q Okay. What did you say and what did he say in
12 that conversation?

13 A At that time, my feeling was that the other
14 stents that were available were only available in -- in
15 single lengths, and that single length was generally longer
16 than 10 millimeters. It was like -- more like 15 to 20
17 millimeter stents were -- were available. And we had a unit
18 which started as short as 4.2 millimeters, and so I
19 suggested to him that we could use that design on a
20 repeating basis to provide different lengths of stents to
21 the market. But also, that physicians would have the
22 availability of a very short stent to apply to a very short
23 segment of the coronary artery.

24 Q Did you have any discussion with Dr. Stertz
25 at that time about how to go about creating these multiple

1 lengths?

2 A No. That's more of an engineering issue.

3 Q Was that engineering issue beyond your
4 personal area of expertise?

5 A Yes.

6 Q When did you first hear of a company called
7 ESS?

8 A Sometime in 1990 or 1991.

9 Q Was it -- did you hear of ESS before you left
10 San Francisco to go to Texas?

11 A You know, I just don't recall.

12 Q Was it your understanding that there was a
13 company that was involved in attempting to get clinical
14 approvals for the use of the Boneau Stent? Let me rephrase
15 that. I said it backwards.

16 Was it your understanding back in mid-1990,
17 when you were trying to get money from Baylor, that there
18 was a corporation that was trying to get approval for
19 clinical trials of the Boneau Stent?

20 A I was not aware of the particular structure.
21 You know, to me, the -- the company was Stertzer or he was
22 the representative of an entity. But as far as the legal
23 classification of that structure, I was not aware of that.

24 Q All right. At some point you learned that
25 Boneau, Stertzer and Hidalgo were one-third owners in this

1 your favor, so you left it alone. It had --

2 A Yeah. It didn't hurt me.

3 Q -- Potentially some value. It didn't hurt
4 you, right?

5 A Didn't hurt me, yeah.

6 Q What variables do you think there are in the
7 \$25,000 sale to Dr. Dorros and the \$15,000 sale to you?

8 A I'm sure I can't list all of them to you.
9 Dr. Dorros had a bigger pocketbook than I did and that's
10 what Mike was able to negotiate with him.

11 Q And do you see anything wrong with that?

12 A Do I see anything wrong with it? No, I
13 don't. Because Mike Boneau has more information -- has much
14 more information than Dorros does. Dorros has no
15 involvement in the stent project or has no ownership in
16 ESS.

17 Mike Boneau invents the stent. He knows
18 what's going on. He knows it's limitations from the
19 engineering standpoint, the patent, et cetera. So Mike is
20 the source of information.

21 Q Right. And given that he has that
22 information --

23 A Uh-huh.

24 Q -- don't you think he has an obligation to
25 make sure that Dr. Dorros doesn't overpay as compared to

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2 AZAM ANWAR, M.D., Individually) IN THE DISTRICT COURT
3 and on Behalf of ENDOVASCULAR)
4 SUPPORT SYSTEMS, INC., and)
5 BENITO HIDALGO, Individually)
6 and on Behalf of ENDOVASCULAR)
7 SUPPORT SYSTEMS, INC., a)
8 California Corporation.)
9 VS.) DALLAS COUNTY, TEXAS
10)
11 ARTERIAL VASCULAR ENGINEERING,)
12 INC., a Delaware Corporation,)
13 SIMON H. STERTZER, M.D., GERALD)
14 DORROS, M.D., JOHN MILLER and)
15 BRADLY JENDERSEE) 298TH JUDICIAL DISTRICT
16 &
17 SUPERIOR COURT OF THE STATE OF CALIFORNIA
18 COUNTY OF SAN MATEO
19 BENITO HIDALGO; DR. AZAM ANWAR,) CASE NO. 397221
20 Individually and on behalf of)
21 ENDOVASCULAR SUPPORT SYSTEMS,)
22 INC.,)
23 Plaintiffs,)
24 VS.)
25 ARTERIAL VASCULAR ENGINEERING,)
26 INC., a Delaware Corporation;)
27 SIMON H. STERTZER, M.D.; GERALD)
28 DORROS, M.D.; JOHN D. MILLER;)
29 BRADLY A. JENDERSEE, and DOES)
30 ONE through TEN, inclusive.)
31 Defendants.)
32
33 VIDEOTAPED ORAL DEPOSITION OF AZAM ANWAR, M.D.
34
35 TAKEN ON MARCH 12, 1997
36
37 VOLUME III OF V

1 those conversations occur after the S-1 came out in February
2 of 1996?

3 A I believe most of those conversations took
4 place after we saw the S-1.

5 Q Did any of those conversations that you've
6 described in your -- second part of your discussion of
7 conversations occur before the S-1 came out?

8 A I don't recall.

9 Q Okay. Have you now covered all of the
10 categories and types of conversations that you can recall
11 having with Mr. Hidalgo from the time you bought your ESS
12 stock up until the time you decided to file suit?

13 A I also remember that he reiterated from the
14 historical perspective that he was instrumental in bringing
15 Mr. Masagung on as a -- as being the major investor who
16 bankrolled the -- the venture. I also remember him telling
17 me from historical perspective that, you know, he and Mike
18 Boneau designed the stent and he -- I recall him telling me
19 at that time that he had seen a bracelet on -- on one of his
20 daughter's arms and the concept of the zigzag configuration,
21 he feels, started at that time. That was his recollection
22 of his involvement in the development of the stent.

23 Q Okay. Did those two conversations or maybe a
24 single conversation where Hidalgo said he was instrumental
25 in bringing Masagung on as an investor and said that he felt

1 that the zigzag design of the Boneau Stent started with him,
2 were those also after you were talking about filing a
3 lawsuit?

4 A It was brought up after the lawsuit. Some of
5 those things have also been -- had been discussed before
6 over my previous five or six years of knowing him.

7 Q I was just talking about these last two
8 items. Did Hidalgo tell you that he was instrumental in
9 bringing Masagung in as an investor in AVE before the S-1
10 came out or after the S-1 came out?

11 A I have a specific recollection that we talked
12 about that in February of '96 after the S-1. Now, many of
13 his conversations may -- or points may have been brought out
14 over the years of, you know, contact with him. Sure.

15 Q Do you recall Mr. Hidalgo saying before the
16 AVE S-1 came out that he had been instrumental in bringing
17 Putra Masagung in as an investor in AVE?

18 A Yeah. I recall he telling me that before. I
19 can't place a time of when he told me that, though.

20 Q All right. When did Mr. Hidalgo tell you that
21 he felt he had contributed to the design of the Boneau Stent
22 with this story about the bracelet? Was that after the S-1
23 came out or before?

24 A I have a recollection that he told me about
25 that after the S-1.

1 Q Do you have a recollection of him telling you
2 that before the S-1 came out?

3 A I don't have a specific recollection of that
4 before the S-1.

5 Q Okay. Did Mr. Hidalgo ever claim that he had
6 been involved in coming up with the zigzag design of the
7 Boneau Stent in a conversation in which Michael Boneau was
8 in on the conversation with the two of you?

9 A I don't recall.

10 Q Did you ever ask Mike Boneau whether he
11 believed that Hidalgo had had a role in the design or
12 invention of the Boneau Stent?

13 A No, sir, I didn't.

14 Q You never told Mike Boneau this story or
15 anecdote about Hidalgo coming up with the zigzag design from
16 a bracelet; is that correct?

17 A I don't recall, no, sir.

18 Q All right. Now, have you completed your --
19 have you now exhausted your recollection of the topics that
20 you've discussed and generally when you discussed them with
21 Mr. Hidalgo, from the time you bought your ESS stock in '91
22 to the time you decided to file a lawsuit in '96?

23 A I believe I've covered most of what I can
24 remember, yeah.

25 Q Well, every time you say you've covered most I